

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DONALD J. TRUMP FOR PRESIDENT, INC.; et al.,) CIVIL ACTION
)
)
Plaintiffs,)
v.) No. 2:20-CV-966
)
KATHY BOOCKVAR; et al.,)
)
Defendants.) JUDGE NICHOLAS RANJAN

STIPULATION

Plaintiffs and the undersigned County Election Boards, by their undersigned counsel, hereby stipulate as follows:

1. The undersigned County Election Boards desire a prompt resolution of this case in order to have direction on how to properly proceed in the upcoming November 2020 General Election. Accordingly, the undersigned County Election Boards take no position by neither admitting nor denying the allegations in the Verified Amended Complaint and the undersigned County Election Boards agree to make no further filings in this case beyond this Stipulation in response to the Verified Amended Complaint.

2. To the extent reasonably possible and in the absence of agreed upon extension by Plaintiffs, the undersigned County Election Boards stipulate and agree that they shall, by August 5, 2020, answer and respond fully and completely, subject to only objections concerning privilege, the written interrogatories and document requests served upon them by Plaintiffs on July 24, 2020, and produce to Plaintiffs' counsel all requested non-privileged items and documents.

3. In exchange for the undersigned County Election Boards' stipulation and cooperation in discovery, Plaintiffs stipulate and agree to forego any claim for attorneys' fees and costs against only the undersigned County Election Boards and agree not to enter default or seek any further response from the undersigned County Election Boards in this case.

4. To the extent the deposition testimony or other sworn statement of the undersigned County Election Boards shall be reasonably necessary for evidentiary purposes, Plaintiff and the undersigned County Election Boards stipulate and agree to reasonably cooperate with each other to provide such testimony or statement in the least burdensome manner.

Respectfully submitted,

PORTER WRIGHT MORRIS & ARTHUR LLP

Dated: August 7, 2020

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Dated: August 7, 2020

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